

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Broadband, Video and Market Branch**

**RESOLUTION T-17819  
June 20, 2024**

**RESOLUTION**

**Resolution T-17819: Approves two project proposals for \$320,126 and conditional approval of one project proposal for \$1,001,697 and denies one proposal from the California Advanced Services Fund Broadband Adoption Account submitted in the January 2024 application round.**

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**I. Summary**

This Resolution approves grant funding in the amount of \$320,126 from the California Advanced Services Fund (CASF) Broadband Adoption Account (Adoption Account) to the Los Angeles County Office of Education (LACOE) (Equitable Communities: Digital Literacy in a Technical Society – Hawthorne, - Lancaster), and conditional approval of grant funding in the amount of \$1,001,697 to Parent University (Parent University: California). Collectively, these projects will provide digital literacy training to 5,340 participants. This Resolution denies grant funding for one project to Link Health (Digital Inclusion Initiative: Bridging the Digital Divide through Enhanced Broadband Access and Affordable Connectivity Program (ACP) Enrollment).

**II. Background**

On October 15, 2017, Governor Brown signed Assembly Bill (AB) 1665 (Garcia) into law. This legislation amended the statutes governing the CASF program, Public Utilities Code sections 281, 912.2, and 914.7, and added the Adoption Account, which provides grants to increase publicly available or after school broadband access and digital inclusion and allocated \$20 million to the account. Eligible applicants include local governments, senior centers, schools, public libraries, non-profit organizations, and community-based organizations with programs to increase publicly available or after-school broadband access and digital inclusion. The California Public Utilities Commission (Commission) is required to give preference to programs in communities with demonstrated low broadband access, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption.

On June 21, 2018, the Commission issued Decision (D.)18-06-032 which implemented provisions of AB 1665 and adopted rules and guidelines for the Adoption Account (Adoption Account Guidelines). On February 21, 2019, the Commission issued D.19-02-008, modifying and clarifying the Adoption Account Guidelines.

In 2021, the Legislature deleted the minimum cumulative appropriation for each of the CASF accounts and authorized the Commission to recommend to the Legislature these appropriation amounts.<sup>1</sup> Consequently, the Commission issued D.22-05-029 which set an appropriation amount of \$20.024 million for fiscal year 2022/2023 for the Adoption Account. For fiscal year 2023/2024, the Commission issued Resolution T-17782 which set an appropriation amount of \$20.24 million for the Adoption Account. These appropriations were adopted in the California Budget Act for the respective fiscal year.

In D.22-05-029, the Commission made further modifications and programmatic changes to the Adoption Account Guidelines. Key provisions of the Decision relevant to this Resolution include:

- *Moneys in the Adoption Account are available to the Commission to award grants to increase publicly available or after-school broadband access and digital inclusion, such as grants for digital literacy training programs and public education to communities with limited broadband adoption, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption;*
- *Eligible applicants are local governments, senior centers, schools, public libraries, nonprofit organizations, and community-based organizations with programs to increase publicly available or after school broadband access and digital inclusion, such as digital literacy training programs;*
- *Projects eligible for grant funding include digital literacy projects and broadband access projects. Digital literacy projects may include digital literacy training programs and public education to communities with limited broadband adoption.<sup>2</sup>*
- *The Commission assigned Commission Division (CD) staff (Staff) the task of approving applications that meet the criteria for ministerial review;*
- *Applications with grant requests that exceed \$150,000 are not eligible for ministerial approval.*
- *Applications from nonprofit organizations that have not existed for one year are not eligible for ministerial review.*
- *Applications that do not meet ministerial review criteria may still be considered for a grant by the Commission via Resolution approval.<sup>3</sup>*

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<sup>1</sup> Public Utilities Code section 281, subdivision (d)(3).

<sup>2</sup> See Decision, Slip. Op., at Section V (Appendix 2).

<sup>3</sup> See Decision, Slip. Op., at Section X (Appendix 2).

### III. Applicant Request

This Resolution considers three projects listed in Table 1 and submitted in the January 1, 2024 application round<sup>4</sup> that do not qualify for ministerial review and one project listed in Table 1 that qualifies for ministerial review but is not recommended for approval.

**Table 2: Projects Addressed in the Resolution**

APPLICANT NAME	PROJECT NAME	PROJECT TYPE	REQUESTED FUNDING	ACTION	REASON
Los Angeles County Office of Education	Equitable Communities: Digital Literacy in a Technical Society - Hawthorne	Digital Literacy	\$160,063	Provide funding approval by Commission resolution	Requested funding over \$150,000 for a single project.
Los Angeles County Office of Education	Equitable Communities: Digital Literacy in a Technical Society - Lancaster	Digital Literacy	\$160,063		Requested funding over \$150,000 for a single project.
Parent University	Parent University: California	Digital Literacy	\$1,001,697		Requested funding over \$150,000 for a single project. The nonprofit organization has existed for less than one year.
Link Health	Link Health Los Angeles Digital Inclusion Initiative: Bridging the Digital Divide through Enhanced Broadband Access and ACP Enrollment	Broadband Access	\$147,000	Deny funding by Commission resolution	ACP no longer accepting new enrollments/ applicant did not withdraw on request.

### IV. Project Evaluation Process

D.22-05-029 states that all applications be reviewed, and awarded based on completeness, overall quality, and project costs reasonableness.<sup>5</sup>

*Overall Quality:* All projects were reviewed based on how well they met the requirements and goals set out in D.22-05-029 to increase publicly available or after-school broadband access and digital inclusion in communities with limited broadband adoption.

<sup>4</sup> The total number of projects submitted in the January, 2024, round is 61 projects (from 23 applicants) for a total request of \$7,528,726 (a list of all submitted projects can be found on the [CASF Adoption Account website](#)).

<sup>5</sup> See D.22-05-029, Slip. Op., at Section VIII (Appendix 2).

*Completeness:* D.22-05-029 requires all applicants to submit a complete application package that includes the project description, work plan, performance metrics, detailed budget, cover letter, curriculum (if applicable), as well as a notarized affidavit. Additionally, nonprofit applicants are required to provide tax documents showing their status as a nonprofit organization and documentation showing good standing with the United States Internal Revenue Service (IRS), the California Secretary of State, or the California Department of Justice. Staff reviewed each project's application to ensure that all the required information was submitted. If the application was incomplete, Staff requested further information from applicants to complete the application to meet program requirements.

*Budget:* D.22-05-029 states the Commission may fund up to 85 percent of the total eligible program costs and may reimburse for education and outreach efforts, travel, computing devices,<sup>6</sup> printers, network routers, switches, modems, and cabling deployed for the purpose of establishing a space for broadband access or digital literacy that connects to an existing in-building broadband network such as Wi-Fi (inside network), mobile hotspots (only when no inside network is available), administrative costs (limited to 15% of the overall budget), staffing for instruction and technical support, desks, chairs, and the gathering, preparing, creating and distribution of digital literacy curriculum (see Appendix D).<sup>7</sup> Staff reviewed each project's budget to ensure that no more than 85 percent of eligible program costs were included and asked applicants to adjust their budgets to remove any ineligible expenses such as reimbursement for rent, utilities, internet service, lodging, and snacks.<sup>8</sup>

Staff further reviewed project budgets, cost reasonableness, and evaluated overall cost per participant. Staff evaluated the mean, median, minimum, and maximum request amount for each expense category and determined a reasonable cost for expenses, and reviewed all expenses to ensure budgeted items were attributable to a required activity.

## **V. Project Review and Recommendations for Funding**

Staff recommends funding for the three projects based on the quality, completeness,

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<sup>6</sup> Reimbursement for computing devices used in community training rooms or other public space is capped at \$11,250 per project and limited to \$750 per device; Reimbursement for take-home computing devices is capped at \$300 per device, limited to two computing devices per eligible household, and limited to \$40,000 per project; Reimbursement for hotspots is capped at \$300 per device and limited to \$20,000 per project. (See D.22-05-029, Slip. Op. Section VI (Appendix 2)).

<sup>7</sup> See D.22-05-029, Slip. Op., Section V (Appendix 2).

<sup>8</sup> Project costs not authorized for funding by the Adoption grant must be funded by other sources (leveraged or self-funding). See D.22-05-029, Slip. Op., Section V (Appendix 2).

and cost reasonableness of the application. See Appendix A, “Approved Project Budget and Performance Metrics,” for per-project details of the approved budget and expected outcomes.

Staff reviewed the applications and found that the following projects align with CASF’s goal to increase publicly available or after-school broadband access and digital inclusion to serve communities with limited broadband adoption and recommends approval for these projects. Details of each Adoption Account application are discussed below.

Los Angeles County Office of Education (LACOE) - (two digital literacy projects)

Los Angeles County is the most populous county in the State of California, with more than 10 million residents across 4,084 square miles. LACOE is the nation’s largest regional education agency, comprised of 80 K-12 school districts and serving 1.4 million students and their families each year. Established in 1852, the agency serves as an intermediate organization between local school districts and the California Department of Education. The agency works closely with the school districts as well as public and private partners to provide integrated educational programs and services to a wide range of diverse communities across the county.

LACOE submitted two projects for two separate school districts, Hawthorne, and Lancaster. LACOE will target specific elementary schools in each school district and will host digital literacy training courses for the surrounding community with a goal of providing such training (both in-person and online) to 3,240 people, both students and their families (1,620 people trained for the Hawthorne and Lancaster projects, respectively). LACOE considers schools to be essential hubs for access to student and family services and will promote the program through such services.

LACOE will develop a promotional toolkit for schools in the district including flyers, social media tools, and direct mail pieces and promote the program through the district-wide Student Information System and promotional events. LACOE will target their outreach through services offered, such as services for those with learning disabilities and services for limited English speakers. LACOE will also target students in the district that are eligible for free and reduced meals, which represents families with incomes between 130 and 185 percent of the federal poverty level.

Therefore, Staff recommends awarding total CASF funding for two digital literacy projects in the amount of \$320,126, at the cost of \$67.88 per participant trained program

implementation costs (see Appendix A for information on per project evaluation, funding request and recommended funding).

Parent University - (one digital literacy project)

Parent University is a recently formed non-profit organization (the articles of incorporation were filed with the California Secretary of State as a public benefit corporation on October 18, 2023). The intent of Parent University is to provide linguistically and culturally appropriate digital literacy trainings to underserved low-income families in a variety of languages including but not limited to English, Spanish, Hmong, Punjabi, Triqui, and Mixteco.

Over 20 years ago, before its incorporation as a nonprofit, Parent University began as a program of the Huron Technology Center in Huron, California. The Huron Technology Center partnered with the Coalinga-Huron Unified School District, City of Huron, Mexican Consulate (Plaza Comunitaria), Westhills Community College and Youth Centers of America (YCA) to run the computer classes in Huron. Funding was provided by local and federal grants. This work was expanded to other locations in Fresno County through the YCA and was eventually incorporated into the Fresno Unified School District in a newly developed Fresno Unified Parent University program. A principal person involved throughout the history of Parent University, Eduardo Gonzales,<sup>9</sup> was brought into California State University, Fresno Foundation (Fresno Foundation) to implement the Parent University model. Under the direction of Mr. Gonzales, the Fresno Foundation received 31 grants awarded through the CASF Adoption Account for both digital literacy projects and call center projects.

The name “Parent University” was registered to the YCA of which Mr. Gonzales was the Executive Director before his employment with the Fresno Foundation. Parent University was granted use of the name by YCA and presently collaborates with YCA (now called the Central Valley Resource Center Services Corporation) in operating virtual classes.

Parent University will provide culturally and linguistically appropriate digital literacy training (online only) to 2,100 primarily low-income residents often in rural areas of the state. Parent University will extend its outreach efforts to vulnerable and underserved communities such as agricultural communities, rural and urban low-income neighborhoods, immigrant populations with limited English proficiency or non-existent

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<sup>9</sup> Eduardo Gonzales will be assisting Parent University as an unpaid consultant. Mr. Gonzales left the Fresno Foundation in October of 2023.

language skills, and areas with low educational attainment rates. To ensure widespread awareness of the class offerings, promotion will be conducted through local community governments, school districts, and migrant education programs.<sup>10</sup>

Per D.22-05-029, nonprofit applicants must submit an IRS letter approving the applicant's status as a 501(c)(3) entity.<sup>11</sup> Parent University received its IRS Employee Identification Number (EIN) in October of 2023. The California Secretary of State website lists Parent University as a nonprofit public benefit corporation (in good standing). Parent University applied for 501(c)(3) nonprofit status with the IRS and stated that it expects to receive its IRS Letter of Determination as to nonprofit status by end of June 2024.<sup>12</sup>

Although Parent University is a recently formed nonprofit, the Parent University digital literacy teaching model has existed for over 20 years. The parties involved with forming the nonprofit were there since the launch of the program and have 20 years of experience operating and managing Parent University classes. The Parent University model is currently used by the Fresno Unified School District and by California State University, Fresno Foundation. The curriculum developed by the Fresno Foundation has been used by a number of nonprofit organizations who have received CASF Adoption Account funding. Because of Parent University's proven track record, and its IRS Letter of Determination is expected in June 2024, Staff considered Parent University's application pending the IRS approval of Parent University's status as a 501(c)(3) entity. Thus, Staff recommends that the CASF Adoption Account grant award for the proposed project in the amount of \$1,001,697, at a cost of \$475.57 per participant program implementation costs is conditioned on IRS approval of Parent University's 501(c)(3) application and receipt of Parent University 501(c)(3) approval letter to the Communications Division (CD) Director no later than October 31, 2024 as discussed below.

Parent University must notify the CD Director in writing that the IRS approves Parent University's 501(c)(3) status and provide the approval letter. At that time, the CD Director will, in writing, approve the release of CASF funding and Parent University

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<sup>10</sup> Parent University anticipates that a large percentage of Parent University outreach and those of partner organizations/agencies (migrant education programs, rural Community Based Organizations, County office of Education, city, and community stakeholders) will be focused on those populations that are currently served by programs or direct service, including low-income communities and disadvantaged neighborhoods.

<sup>11</sup> See D.22-05-029, Slip. Op., Section VII (Appendix 2).

<sup>12</sup> See communication from Executive Director Ana Gonzales (sent by email from Parent University on March 11, 2024) which states IRS letter of Determination will be received by June 2024.

can proceed with project funded activities. Any costs incurred prior to the CD Director's notification of the release of funding are not reimbursable. If Parent University does not notify the CD Director and provide the IRS 501(c)(3) approval letter by October 31, 2024, CASF Adoption Account funding for Parent University's project is automatically rescinded.

#### Staff Recommendation Denying the Link Health Project (one project)

Link Health<sup>13</sup> submitted one project (Link Health Los Angeles - Digital Inclusion Initiative: Bridging the Digital Divide through Enhanced Broadband Access and ACP Enrollment) to promote the ACP. Due to an exhaustion of existing funds, the Federal Communications Commission (FCC) stopped accepting new ACP applications and enrollments on February 7, 2024.<sup>14</sup> Given that the ACP is no longer accepting new applications, Staff requested that Link Health withdraw its application; however, Link Health failed to respond to this request. Therefore, Staff recommends the Commission deny Link Health's application for funding in this Resolution.

## **VI. Compliance Requirements**

LACOE and Parent University are required to comply with all the guidelines, requirements, and conditions associated with the grant of CASF funds as specified in D.22-05-029. Such compliance includes but is not limited to the items listed below.

### *A. Execution and Performance*

LACOE and Parent University must start the project within six months after submitting a consent form and complete the project within a 24-month time frame. The Commission may withhold, reduce, or terminate grant payments if the grantee does not comply with any of the requirements set forth in its application or the CASF rules. If the grantee fails to complete the project in accordance with the terms of approval granted by the Commission, LACOE and Parent University must reimburse some or all the CASF funds it has received.

LACOE and Parent University must complete all performance under the award by the termination date of the award.

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<sup>13</sup> Link Health is a recently formed nonprofit incorporated in Massachusetts as Voter Inc who received their nonprofit 501(c)(3) designation from the IRS in 2021.

<sup>14</sup> See <https://www.fcc.gov/affordable-connectivity-program-consumer-faq> (April 22, 2024)



LACOE and Parent University must sign a consent form within 30 days of the date of the award agreeing to the terms stated in the Resolution. A completed and executed consent form should be emailed to [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov) within 30 calendar days from the date of the award. The Commission will deem the grant null and void for failure to submit the consent form within 30 calendar days from the date of the award

Material changes in the entries shown in the application, such as discontinuing operation or bankruptcy, or change of name (including DBA), change of address, telephone, fax number or E-mail address should be reported by a letter to the Commission Director of the Communications Division, 505 Van Ness Avenue, San Francisco, CA 94102.

*B. Project Audit and Reporting Requirements*

See Appendix B.

## **VII. Payments to CASF Recipients**

Reimbursement payments will be made in accordance with, and within the time specified in the California Government Code, section 927, et seq. LACOE and Parent University must notify the Director of the Communications Division as soon as they become aware that they may not be able to meet project deadlines. The Commission may withhold or reduce payment if LACOE and Parent University fails to notify the Director of such changes. See Appendix C for payment details. LACOE and Parent University must submit final requests for payments no later than 3 months after completion of the project.

## **COMMENTS ON DRAFT RESOLUTION**

In compliance with Public Utilities Code section 311, subdivision (g)(1), a notice letter was emailed on May 7, 2024, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at <http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website.

## **FINDINGS**

1. On or before January 1, 2024, staff received four applications for the four projects being considered in this resolution.
2. Staff reviewed the applications and recommended awards based on completeness, overall quality, and project cost reasonableness.
3. Based on its review, Staff determined that three of the four projects qualify for funding under D.22-05-029 and recommends funding the projects as listed in Appendix A.
4. D.22-05-029 requires nonprofit applicants to submit an IRS letter approving the applicant's status as a 501(c)(3) entity. Parent University is a nonprofit and applied for IRS 501(c)(3) status, approval of which is currently pending.
5. Staff recommends that Parent University's CASF Adoption grant award for the proposed project is conditioned on IRS approval of Parent University's 501(c)(3) application and submission of the approval letter to the CD Director by October 31, 2024.
6. Based on its review, Staff recommends denying Link Health's Adoption Account application since its proposed project is for ACP promotion and the ACP is no longer accepting applications.
7. A notice letter was emailed on May 7, 2024, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at <http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website.

### **THEREFORE, IT IS ORDERED that:**

1. The Commission shall award the following grant amounts:
  - \$320,126 to LACOE for two projects;
  - \$1,001,697 to Parent University for one project;

The total grant award is \$1,321,823. All awards are based on the descriptions of the projects as described herein and are predicated on commitments to provide adoption services as expressed in its application and in compliance with all guidelines, requirements and, conditions associated with a CASF award, as specified in D.22-05-029, and this Resolution.

2. The CASF Adoption Account grant award to Parent University is conditioned on IRS approval of Parent University's 501(c)(3) application and Parent University notifying the CD Director, in writing, of the approval and providing the approval letter to the CD Director by October 31, 2024. If Parent University does not notify the CD Director and provide the IRS 501(c)(3) approval letter by October 31, 2024, CASF Adoption Account funding for Parent University's project is automatically rescinded.
3. Upon receipt of the IRS approval letter by October 31, 2024, the CD Director shall, in writing, approve the release of CASF funding and Parent University can proceed with the grant. Any costs incurred prior to the CD Director's notification of the release of funding are not reimbursable.
4. LACOE and Parent University must complete all work and achieve all performance metrics identified in Appendix A of this Resolution and workplans submitted with its application.
5. LACOE and Parent University must complete and execute the consent form (to be sent to grant recipients after this Resolution is adopted) agreeing to the conditions set forth in this Resolution.

A completed and executed consent form must be emailed to [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov) within 30 calendar days from the date of the adoption of this Resolution. Failure to submit the consent form within 30 calendar days from the date of the adoption of this Resolution will void the grant.

6. By receiving a CASF grant, LACOE and Parent University agree to comply with the terms, conditions and requirements of the grant and thus submits to the jurisdiction of the Commission with regard to disbursement and administration of the grant.

7. LACOE and Parent University must maintain files, invoices, and other related documentation for three years after final payment and shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after grant recipients incurred the expense being audited.
8. If LACOE and Parent University fail to complete the project in accordance with the terms outlined in D.22-05-029 and this Resolution, they must reimburse some or all the CASF funds it has received.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on June 20, 2024. The following Commissioners approved it:

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Rachel Peterson  
Executive Director

**APPENDIX A**  
**Approved Project Budget and Performance Metrics**

#	Applicant Name	Project Name	Project Type	Provide Digital Literacy Training to (Participants)	Projected Number of Participants Who Will Subscribe to Broadband	In-classroom devices	Take-home Devices	Total Device Award*	Amount for Program Implementation	Total Adoption Account Award
1	Los Angeles County Office of Education	Equitable Communities: Digital Literacy in a Technical Society - Hawthorne	Digital Literacy	1,620	0	\$ 11,097	\$ 39,000	\$ 50,097	\$ 109,966	\$ 160,063
2	Los Angeles County Office of Education	Equitable Communities: Digital Literacy in a Technical Society - Lancaster	Digital Literacy	1,620	0	\$ 11,097	\$ 39,000	\$ 50,097	\$ 109,966	\$ 160,063
3	Parent University	Parent University: California	Digital Literacy	2,100	210	\$ 3,000	\$ -	\$ 3,000	\$ 998,697	\$ 1,001,697
				5,340	210					\$ 1,321,823

\* Neither applicant is asking for hot spot devices.

## **APPENDIX B**

### **Reporting Requirements**

#### **Project Audit**

LACOE and Parent University (grant recipients) must maintain files, invoices, and other related documentation for three years after final payment. Grant recipients shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after the grant recipients incurred the expense being audited.

#### **Project Reporting Requirements**

The grant award is contingent upon fulfilling reporting requirements during and after project completion as specified in D.22-05-029, Appendix 2, Section XIII.

A template for all necessary reports is provided in the CASF Adoption Program Administrative Manual, which is posted on the Commission's Adoption Account website and is also available directly from the website. Up to three reports will be required throughout the course of the project:

*i. Ramp-up period report*

A "ramp-up period report" is required after completion of the ramp up activities and when deployment is set to begin (if applicable). This report must be submitted by no later than 3 months after the completion of the ramp up activities. In this report, recipients will report on the completion of the ramp up activities per the work plan, milestones met, as well as request payment for relevant expenses to date. The ramp up period may not exceed 6 months from the time the application is approved.

*ii. Year 1 Progress Report*

The Year 1 progress report is required at the end of the first year of deployment. This report must be submitted by no later than 3 months after the end of the first year of deployment. In this report, recipients will report on the status of Year 1 milestones per the work plan, as well as request payment for relevant expenses to date.

*iii. Year 2 Completion Report*

The Year 2 completion report is required at the end of the 24-month period, or after the work plan milestones/deliverables have been accomplished if earlier than the 24-month period. This report must be submitted by no later than 3 months after completion of the project. In this report, recipients will report on the completion of the overall project, milestones met per the work plan, as well as request payment for final and remaining relevant expenses.

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All required reports must be submitted via email to: [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov). The grant recipients must certify that each report submitted is true and correct under penalty of perjury.

End of Appendix B

## APPENDIX C Payments to CASF Recipients

- LACOE and Parent University (grant recipients) may submit payment requests at 3 points throughout the project period. Payment requests may accompany the 3 reports noted above (Ramp Up Period, if applicable, Year 1, Year 2).
- Payment requests may also be submitted separately from and in addition to the Calendar Year reporting described above, provided that each payment request includes the information provided on the most recently submitted Calendar Year report and any additional information or costs incurred since the most recent Calendar Year report was submitted.
- Whether tied to Calendar Year reporting or outside of that reporting schedule, no more than three payment requests may be submitted.
- Payment request for the ramp-up period may not exceed 25% of the grant amount.
- No more than 90% of the grant amount will be reimbursed before the completion report and final payment request;
- All payments requests require documentation of project participation (number of participants trained or provided access and the number of participants that subsequently subscribe to a broadband Internet service provider to use a device in their home).
- Grant recipients shall submit final requests for payment no later than 3 months after completion of the project.
- Payment will be based upon receipt and approval of invoices and other supporting documents showing the expenditures incurred for the project are in accordance with their approved application and budget.
- Grant must notify the Director of the Communications Division as soon as they become aware that they may not be able to meet project deadlines. The Commission may withhold or reduce payment if the grantee fails to notify the Director of the Communications Division of such changes.
- Payment will be made in accordance with, and within the time specified in California Government Code § 927 et seq.
- The Commission has the right to conduct any necessary audit, verification, and discovery during project implementation to ensure that CASF funds are spent in accordance with the terms of approval granted by the Commission.
- The Grant recipients' invoices will be subject to audit by the Commission at any time within three years of final payment.

Grant recipients must certify that each report and payment request submitted is true and correct under penalty of perjury. All required reports and payment requests,



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including invoices and other supporting documents should be submitted via email to:  
[CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov).

**APPENDIX D**  
**Allowable Costs per Decision 22-05-029**

The Commission may fund up to 85 percent of the eligible program costs and may reimburse the following:

- a. Education and outreach efforts (including travel, up to 10% of approved grant amount) and materials;
- b. Acceptable computing devices (does not include smartphones) within budgetary limits and inclusive of computer warranty;
  - In-classroom computing devices
  - Take-home computing devices (for Digital Literacy Projects only)
- c. Software (inclusive of licensing for online platforms);
- d. Printers
- e. Network routers, switches, modems, and cabling deployed for the purpose of establishing a space for broadband access or digital literacy that connects to an existing in-building broadband network such as Wi-Fi (inside network);
- f. Mobile hotspots, only when no inside network is available;
- g. Provision of technical support for the computing devices subsidized through this program;
- h. Desks and chairs to furnish a designated space for digital literacy or broadband access;
- i. For Digital Literacy Projects, gathering, preparing, creating, and distributing digital literacy curriculum;
- j. Staff including digital literacy instructors, staff for monitoring the designated space, or staff for administering call centers (if applicable); and
- k. Reimbursement for administrative costs,<sup>15</sup> (other than for excluded items, listed below) is limited to administrative costs representing 15% or less of the overall proposed budget.

Device technical support must be able to respond either by phone or in person within 24 hours. Refurbished devices must have at least a six-month warranty. New devices must have at least a 30-day warranty.

Facility rent, utilities, internet service costs, food costs, lodging, marketing incentives for participation (gift cards, giveaways, etc.), certain classroom supplies and accessories, and other items not listed above are not eligible for reimbursement. All funding

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<sup>15</sup> "Administrative costs" are defined here as "indirect overhead costs attributable to a project per generally accepted accounting principles (GAAP) and the direct cost of complying with Commission administrative and regulatory requirements related to the grant itself," consistent with other CASF program rules.

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requests will be assessed for reasonableness and may be adjusted accordingly at the discretion of the Commission. Any remaining project costs not authorized for funding by the CASF Adoption grant must be funded by other sources (leveraged or self-funding).

End of Appendix D